

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

ALEXUS JOHNSON,
Plaintiff,

v.

EQUIFAX INFORMATION
SERVICES LLC and I.Q. DATA
INTERNATIONAL, INC.
Defendants.

CIVIL ACTION NO.: 4:24-cv-456-P

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

ALEXUS JOHNSON ("Plaintiff"), by and through the undersigned attorney, files this Designation of Expert Witnesses pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Scheduling Order entered in this matter.

Plaintiff supplements any and all previous discovery responses and responses to disclosures to reflect that the following persons may be called to give expert testimony at trial for this matter. Plaintiff reserves the right to supplement, amend, or change her opinions in this matter if additional information or documentation is produced. Additionally, Plaintiff reserves the right to supplement, amend, or change her opinions based upon the evidence produced, depositions of parties and non-party witnesses, and additional documentation produced by any party to this lawsuit.

Plaintiff designates the following expert witnesses:

1. **Shakeria Northcross**
Northcross Legal PLLC
539 W. Commerce St. #7226
Dallas, Texas 75208

T: (903) 691-1246

2. Tiffany Hill

TH Legal Consulting LLC

3010 LBJ Freeway, Suite 1200

Dallas, TX 75234

T: (405) 456-9406

Any of the above-listed retained attorneys may be called to testify as to attorney's fees, costs, and expenses incurred in providing counsel to Plaintiff in this litigation, as well as the necessary and reasonableness of work performed and rebut any claim for fees by Defendants and any testimony proffered by Defendants' expert on attorneys' fees.

Any of the above-listed individuals are licensed attorneys and are experienced in the prosecution and defense of this type of action. They are familiar with the pleadings, discovery, and work performed in this cause and the reasonable and customary attorney's fees, expenses, and costs associated with such representation. Both are familiar with the customary time charges, costs, and expenses incurred in this type of federal jurisdiction litigation in Texas. Their mental impressions and opinions are based on their education and experience as attorneys admitted to federal courts in Texas.

They have not and will not produce a report, however, redacted billing statements will be made available to Defendants' counsel for copying and inspection. The redacted billing statements reflecting the work performed for Plaintiff will be timely produced. Plaintiff expressly reserves the right to amend the foregoing response as additional information becomes available.

DATED: December 13, 2024

Respectfully Submitted,

/s/ *Shakeria Northcross*

Shakeria Northcross

Texas Bar No. 24116836

NORTHCROSS LEGAL PLLC

539 W. Commerce St. #7226

Dallas, Texas 75208

T: (903) 691-1246

E: assistant@northcrosslegal.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing documents was served by electronic mail upon all parties and counsel, in accordance with the Federal Rules of Civil Procedure on December 13, 2024.

/s/ *Shakeria Northcross*

Shakeria Northcross